

No. 14-1040

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IN THE  
**United States Court of Appeals for the Federal Circuit**

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**ROBERT BOSCH, LLC, a Delaware corporation,**

**Plaintiff - Appellant,**

**v.**

**SNAP-ON INCORPORATED, a Delaware corporation, DREW  
TECHNOLOGIES, INCORPORATED, a Michigan corporation,**

**Defendants - Appellees.**

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**Appeal from the United States District Court for the Eastern District of  
Michigan in case no. 2:12-CV-11503, Judge Robert H. Cleland.**

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**APPELLANT ROBERT BOSCH, LLC'S UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO FILE ITS OPENING BRIEF**

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Counsel for Appellant Robert Bosch, LLC

November 26, 2013

## CERTIFICATE OF INTEREST

Counsel for Appellant Robert Bosch, LLC certifies the following:

1. The full name of every party or amicus represented by me is:

Robert Bosch, LLC

2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is:

None

3. All parent corporations and any publicly held companies that own 10% or more of the stock of the party or amicus curiae represented by me are:

The parent corporations of Robert Bosch, LLC are Robert Bosch North America Corporation and Robert Bosch Azweite Vermögensverwaltungsgesellschaft mbH, and no publicly held corporation owns 10% or more of the stock of Robert Bosch, LLC.

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court are:

Erik G. Swenson, George W. Jordan II, Jonathan S. Franklin and Sheila Kadura (Fulbright & Jaworski LLP); Sara K. Macwilliams and Rodger D. Young (Young & Associates)

Appellant Robert Bosch, LLC (“Bosch LLC”) moves for a 30-day extension of time to file its opening brief to and including January 23, 2014. Bosch LLC’s opening brief is currently due on December 24, 2013. Bosch LLC has not received any previous extension of time in this appeal. Counsel for Appellant Bosch LLC conferred with counsel for Appellees Snap-On, Incorporated and Drew Technologies, Incorporated, and Appellees do not oppose this requested extension.

### **GROUND FOR MOTION**

Bosch LLC moves for a 30-day extension of time to file its opening brief in light of travel plans due to upcoming holidays and other scheduling demands. Among other commitments, undersigned counsel for Bosch LLC filed a brief in this Court on November 12, 2013, will file another brief in this Court on December 5, 2013, and will file a brief in the Supreme Court of the United States on December 4, 2013. The requested extension of time is needed in order to prepare the best possible brief to aid this Court’s determination of the issues on appeal.

Pursuant to Federal Circuit Rule 26(b)(5), Bosch LLC attaches to this Motion a supporting declaration as Exhibit A.

### **CONCLUSION**

For the foregoing reasons, Appellant Bosch LLC respectfully requests that this Court enter an order extending Bosch LLC’s time to file its opening brief to and including January 23, 2014.

Respectfully submitted,

/s/ Jonathan S. Franklin

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November 27, 2013

Attorneys for Appellant  
Robert Bosch, LLC

**DECLARATION OF JONATHAN S. FRANKLIN  
PURSUANT TO FEDERAL CIRCUIT RULE 26(b)(5)**

1. I am a partner with Fulbright & Jaworski, LLP, and am representing Appellant Robert Bosch, LLC (“Bosch LLC”), in Appeal No. 14-1040.

2. Bosch LLC’s opening brief is currently due on December 24, 2013. Bosch LLC seeks a 30-day extension to file its opening brief to and including January 23, 2014.

3. Bosch LLC moves for this extension in light of travel plans due to upcoming holidays and other scheduling demands. Among other commitments, undersigned counsel for Bosch LLC filed a brief in this Court on November 12, 2013, will file another brief in this Court on December 5, 2013, and will file a brief in the Supreme Court of the United States on December 4, 2013. I believe the requested extension of time is needed in order to prepare the best possible brief to aid this Court’s determination of the issues on appeal. Appellees do not oppose the requested extension.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

11/27/2013  
Date

/s/ Jonathan S. Franklin  
Jonathan S. Franklin

**CERTIFICATE OF SERVICE**

I certify that on November 27, 2013, I served the foregoing document on all counsel of record by email via the Court's ECF System.

/s/ Jonathan S. Franklin  
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